

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MEI L. WANG, MICHAEL Y.J. WANG,
CHUN FANG WANG,

Index No. 07cv05462 (BSJ)

Plaintiffs,

v.

**AMENDED ANSWER TO AMENDED
COMPLAINT**

CYR INTERNATIONAL, INC., CHEW
YOUNG ROO AMERICA, INC. CYR USA,
INC., CHEW YOUNG ROOM, INC., CHEW
YOUNG ROOM, CHEW YOUNG ROO,
EUN CHAN LIM,

Defendants.

-----X

Defendants CYR INTERNATIONAL, INC., CYR USA, INC., CHEW YOUNG ROO
AMERICA, INC. and EUN CHAN LIM, by their attorneys LITCHFIELD CAVO LLP,
answering the amended complaint of the plaintiffs, states as follows:

1. Deny any knowledge or information sufficient to form a belief as to each and every allegation contained in the paragraphs of the Complaint numbered, "1", "5", "6", "7", "9" and "10".
2. Deny each and every allegation contained in the paragraphs of the Complaint numbered "11" and "12".
3. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "13" thereof as hereinbefore denied.
4. Deny any knowledge or information sufficient to form a belief as to each and every allegation contained in the paragraphs of the Complaint numbered "14", "16", "18", "19", "21", "23", "24" and "28".

5. Deny each and every allegation contained in the paragraphs of the Complaint numbered "15", "17", "20", "22", "25", "26" and "27".

6. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "29" thereof as hereinbefore denied.

7. Deny each and every allegation contained in the paragraphs of the Complaint numbered "30" and "31".

8. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "32" thereof as hereinbefore denied.

9. Deny each and every allegation contained in the paragraphs of the Complaint numbered "33" and "34".

10. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "35" thereof as hereinbefore denied.

11. Deny each and every allegation contained in the paragraphs of the Complaint numbered "36".

12. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "37" thereof as hereinbefore denied.

13. Deny each and every allegation contained in the paragraphs of the Complaint numbered "38" and "39".

14. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "40" thereof as hereinbefore denied.

15. Deny each and every allegation contained in the paragraphs of the complaint numbered "41".

16. Answering defendant repeats each and every denial to each and every allegation of the complaint which is realleged in the paragraph numbered "42" thereof as hereinbefore denied.

17. Deny each and every allegation contained in the paragraphs of the complaint numbered "43".

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

18. That the complaint fails to set forth facts sufficient to constitute a cause and/or causes of action upon which relief may be granted insofar as this defendant is concerned.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

19. Plaintiffs lack personal jurisdiction over the defendants.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

20. Additional facts may be revealed by future discovery that supports additional affirmative defenses presently available but unknown to answering defendants. Therefore, answering defendants reserve the right to assert additional defenses in the event that discovery and investigation indicate that additional defenses would be appropriate.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

21. Defendant, CHEW YOUNG ROO AMERICA, INC., does not transact business within the State of New York, nor provides good and services within the State of New York, or

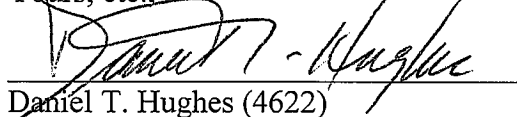
has a business presence within the State of New York. Accordingly, the Court lacks jurisdiction over this defendant.

WHEREFORE, these answering defendants pray that the Court:

- i. dismiss plaintiffs' claims
- ii. deny plaintiffs' prayer for an injunction
- iii. award defendants costs, disbursements and attorneys fees and
- iv. award defendants such other relief as the Court deems just and proper.

Dated: New York, New York
September 25, 2007

Yours, etc..



Daniel T. Hughes (4622)
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New York, New York 10170
(212) 434-0100

Attorneys for Defendants
CYR INTERNATIONAL, INC.,
CYR USA, INC and
EUN CHAN LIM

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New York, NY 10017
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Attorneys for Plaintiffs

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

MARIA C. LLANOS, being sworn, deposes and says: I am not a party to the action, am over 18 years of age, reside in Brooklyn, New York, and am employed in the office of Litchfield Cavo.

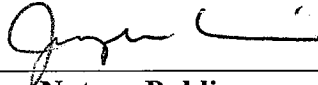
On the 25th day of September, 2007, I served a true copy of the annexed AMENDED ANSWER TO AMENDED COMPLAINT by mailing the same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, addressed to the last-known addressee(s) as indicated below:

MEREDITH & KEYHANI, PLLC
Attorneys for Plaintiffs
330 Madison Avenue, 6th Floor
New York, NY 10017



MARIA C. LLANOS

Sworn to before me this
25TH day of September, 2007



Notary Public

JOSEPHINE CASORIA
Notary Public, State of New York
No. 01CA5022698
Qualified in Nassau County
Commission Expires Jan. 18, 20 10

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEI L. WANG, MICHAEL Y.J. WANG,
CHUN FANG WANG,

Plaintiffs,

- against -

CYR INTERNATIONAL, INC., CHEW, YOUNG ROO AMERICA, INC., CYR USA,
INC., CHEW YOUNG ROOM, INC., CHEW, YOUNG ROOM, CHEW YOUNG ROO,
EUN CHAN LIM,

Defendants.

AMENDED ANSWER TO AMENDED COMPLAINT

Attorneys for

LITCHFIELD CAVO LLP

*Defits-Cyr International, Inc., Cyr USA, Inc., Chew
Young Roo America, Inc. and Eun Chan Lim*

420 LEXINGTON AVENUE
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Pursuant to 22 NYCRR 130-1.1-a, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, (1) the contentions contained in the annexed document are not frivolous and that (2) if the annexed document is an initiating pleading, (i) the matter was not obtained through illegal conduct, or that if it was, the attorney or other persons responsible for the illegal conduct are not participating in the matter or sharing in any fee earned therefrom and that (ii) if the matter involves potential claims for personal injury or wrongful death, the matter was not obtained in violation of 22 NYCRR 1200.41-a.

Dated: Signature

Print Signer's Name

Service of a copy of the within is hereby admitted.

Dated:

Attorney(s) for

PLEASE TAKE NOTICE

Check Applicable Box

☐
NOTICE OF
ENTRY

that the within is a (certified) true copy of a
entered in the office of the clerk of the within-named Court on

20

☐
NOTICE OF
SETTLEMENT

that an Order of which the within is a true copy will be presented for settlement to the
Hon. , one of the judges of the within-named Court,
at
on

20

, at

M.

Dated:

LITCHFIELD CAVO LLP

Attorneys for

To:

420 LEXINGTON AVENUE
SUITE 2104
NEW YORK, N.Y. 10170
(212) 434-0100

Attorney(s) for